

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION

NO. 7:20-CR-167-M

UNITED STATES OF AMERICA )  
v. ) MOTION FOR  
 ) PROTECTIVE ORDER  
LIAM MONTGOMERY COLLINS, A/K/A )  
“Disciple;” PAUL JAMES KRYSCUK, )  
A/K/A “Deacon;” JORDAN DUNCAN, A/K/A )  
“Soldier;” and JUSTIN WADE )  
HERMANSON, A/K/A “Sandman” )

The United States of America requests that this Court issue a protective order restricting the duplication and dissemination of discovery material in this case pursuant to Federal Rule of Criminal Procedure 16(d).

1. The scheduling order as to some of the defendants in this action provides for a pre-trial conference and discovery deadline on December 14, 2020.

2. The discovery material to be produced to the defendants in this case is voluminous. It includes hundreds of documents, including reports of investigation, significant amounts of digital media, financial information, and documents with personal identifying information of individuals, including the defendants and co-defendants that have not yet been apprehended, as well as persons not charged with crimes.

3. It is within the Court's authority under Federal Rule of Criminal Procedure 16(d) to order that the use, further duplication and/or dissemination of the unredacted discovery material be restricted as set forth in the attached proposed protective order.

4. The undersigned has contacted counsel for the defendants for their position on this motion and the proposed protective order. The undersigned received no objection from Ryan Willis (counsel for defendant Paul James Kryscuk), Elliot Abrams (counsel for defendant Liam Montgomery Collins), and Raymond Tarlton (counsel for defendant Jordan Duncan). As of the time of this filing, defendant Justin Hermanson has not yet been arrested and does not have counsel in this proceeding.

WHEREFORE, for the reasons stated above, the United States requests that this Court issue a Protective Order in this case as to all defendants with a scheduling order.

Respectfully submitted this 14th day of December 2020.

ROBERT J. HIGDON, JR.  
United States Attorney

By: /s/ Barbara D. Kocher  
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CERTIFICATE OF SERVICE

I certify that I have on this 14th day of December 2020, served a copy of the foregoing upon the Defendants through counsel via electronic filing system:

/s/ Barbara D. Kocher  
BARBARA D. KOCHER  
Assistant United States Attorney